

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WALTER J. SCOTT, JR.,

Plaintiff,

- against -

BANGKO SENTRAL NG PILIPINAS;
PHILIPPINES VETERANS BANK;
BANKWISE, INC.; WISE HOLDINGS, INC.;
ALBERTO V. REYES; RICARDO A.
BALBIDO; ROBERT F. DE OCAMPO;
NONILO C. CRUZ; AND JOHN AND/OR
JANE DOES 1-20,

Defendants.

Civil Action No.
1:17-CV-02772-DLC

**Declaration of Alberto V.
Reyes**

I, ALBERTO V. REYES, hereby declare under penalty of perjury under the laws of the United States of America as follows:

1. I make this Declaration in support of the motion to dismiss the action against me on the grounds of lack of personal jurisdiction and the doctrine of *forum non conveniens*.
2. I make this declaration based on personal knowledge and my review of the verified first complaint (the "Amended Complaint"), dated June 28, 2017, in the above-captioned case.

A. Exclusive Philippines Citizenship, Domicile and Employment

3. I am and always have been solely and exclusively a citizen of the Philippines.
4. I currently reside at 8 Collins Street, Dona Faustina Village, Tandang Sora, Quezon City, Philippines.

Alberto V. Reyes

5. From June 23, 1995 to April 19, 2005, I served as the Deputy Governor for the Bangko Sentral ng Pilipinas¹ (the “Central Bank of the Philippines”), and was based in its offices in Manila, Philippines. I started my career in the then Central Bank of the Philippines² as Bank Examiner on 18 May 1964, occupying various positions in the Examination Sector until I became Deputy Governor in 1995.

6. In 2006, after the lapse of the one year prohibition on employment with local banks by BSP officers, and up to 2013, I was a member of the Board of Advisers and Consultant of Banco de Oro Universal Bank. Also in 2006 up to the present, I am a consultant of China Banking Corporation and a few smaller banks. All of those assignments have been in the Philippines.

7. Throughout my professional career, I have always been employed by the governmental and corporate entities based in the Philippines and I have always worked principally from my employers’ offices in the Philippines.

B. No Relevant New York or United States Contacts

8. I have never maintained an office in the State of New York or anywhere else in the United States.

9. I have never been employed by an entity or employer in any capacity in the State of New York or anywhere else in the United States.

¹ Republic Act (R.A.) No. 7653 or the New Central Bank Act, which took effect on July 3, 1993, created the Bangko Sentral ng Pilipinas.

² The said Central Bank of the Philippines, which existed under R.A. No. 265 (An Act Establishing the Central Bank of the Philippines, Defining its Powers in the Administration of the Monetary and Banking System, Amending the Pertinent Provisions of the Administrative Code with respect to the Currency and the Bureau of Banking, and for Other Purposes [1948]), continues to exist as the Central Bank Board of Liquidators (CB-BOL), pursuant to the provisions of Section 132 (e) of R.A. No. 7653 or the New Central Bank Act.

Ackrito V. Reyes

10. I have never owned or maintained a bank account or investment account in the State of New York or elsewhere in the United States.

11. I have never resided in the State of New York or anywhere else in the United States. However, I was an official travel to the United States from June to December 1971, for an aggregate period of six months, during which I conducted an examination of Philippine National Bank branches in New York and San Francisco, and attended regulatory agency visits in New York, San Francisco, and Washington, D.C. During said period, I stayed at the YMCA in San Francisco, and in boarding houses in New York and Washington, D.C.

12. I have never owned any property in the United States.

13. I have never paid taxes in the State of New York or anywhere else in the United States, and I have never filed a tax return in the State of New York or anywhere else in the United States.

C. No Availment of New York or United States Law

14. I have never initiated, been a plaintiff in, or participated in the filing of any of any legal action in the State of New York or anywhere else in the United States in my own name or for my own benefit.

I reserve all rights and defenses, including with respect to service, personal jurisdiction, venue and forum, under all applicable law, and specifically assert that this Court lacks jurisdiction over me.

Alejandro V. Leyva

I declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. §1746, that the foregoing is true and correct.

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Dated: September •, 2017
Manila, Philippines

Alberto V. Reyes
Alberto V. Reyes